

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE

ROCHEUX INTERNATIONAL OF
NEW JERSEY, INC.,

Plaintiff,

vs.

U.S. MERCHANTS FINANCIAL
GROUP, INC., U.S. MERCHANTS,
INC., a division of U.S.
MERCHANTS FINANCIAL GROUP,
INC. d/b/a/ U.S. MERCHANTS
and/or THE MERCHANT OF TENNIS,
THE MERCHANT OF TENNIS INC.,
and DIVERSIFIED REPACKAGING
CORPORATION,

Defendants.

CERTIFIED COPY

Civil Action No.:
06-6147

DEPOSITION OF JEFFRIE A. GREEN, VOLUME II

Taken on Tuesday, March 11, 2008, at 10:04 a.m.

Location: Wilson, Elser, Moskowitz, Edelman & Dicker
555 South Flower Street, Suite 2900
Los Angeles, California

Reporter: Jacqueline Campbell Redd, RPR
CSR No. 5284



(Pages 229 - 425)

1 A. Yes.

2 Q. And would you take delivery simultaneously, or
3 do they provide warehousing for material that you
4 ultimately are going to utilize in your processes?

5 A. I believe they provide us with warehousing.

6 Q. And is that similar to the method that you did
7 business with Rocheux?

8 A. Can you be more specific about your question?

9 Q. Sure. When you purchased PVC products -- PVC,
10 A-PET and/or G/A/G -- would the process begin by you
11 issuing a purchase order to Rocheux?

12 A. That would be correct.

13 Q. And would Rocheux in turn issue an order
14 confirmation or order acknowledgment?

15 A. That they did not.

16 Q. That never happened?

17 A. That did not happen.

18 Q. Would your purchase order designate the
19 specifications in the material that you were purchasing?

20 A. It would.

21 Q. And would it designate the quantity of the
22 material that you were purchasing?

23 A. It would. For the most part of our purchase
24 orders with Rocheux were more of a forecast so they
25 would have product in their warehouse that we could draw